

UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF NEW JERSEY

KYLE CANNON, LEWIS LYONS, AND	)	Civil Action No. 16-1452 (RMB)(AMD)
DIANNE LYONS, INDIVIDUALLY	)	
AND ON BEHALF OF ALL OTHERS	)	
SIMILARLY SITUATED,	)	
	)	
Plaintiffs,	)	
v.	)	
	)	<b><u>DECLARATION OF DEREK HANSEN IN</u></b>
ASHBURN CORPORATION, <i>et al.</i> ,	)	<b><u>SUPPORT OF OBJECTION</u></b>
	)	
Defendants.	)	

COUNTY OF CUYAHOGA  
STATE OF OHIO

Derek Hansen, being first duly sworn, declares as follows:

1. I am over the age of twenty one (21), competent to testify and make the following statements based on my personal knowledge.
2. My mailing address is currently 350 Glasgow Drive, Highland Heights, Ohio, 44143.
3. My phone number is (330) 618-0453.
4. During the period of March 15, 2010 to November 1, 2016, I made twelve separate purchases of wine through WTSO.com.
5. A true and accurate list of purchases I made through WTSO.com from March 15, 2010 to November 1, 2016 is attached hereto as Exhibit A.
6. Because I made purchases of wine through WTSO.com from March 15, 2010 to November 1, 2016 as a resident of the United States, I am a member of the Class as defined in the Notice of Class Action Settlement.



6. Because I made purchases of wine through WTSO.com from March 15, 2010 to November 1, 2016 as a resident of the United States, I am a member of the Class as defined in the Notice of Class Action Settlement.

7. On December 28, 2017, I submitted an online Verification Form to remain in the Class at the web address <https://kccsecure.com/winesettlement/Claimaint>. My Claim ID from the Verification Form submission is AUA-10088338-9.

8. I object to this settlement on the grounds identified in the submitted Objection of Derek Hansen and Vytauras Sasnauskas to Settlement Approval and filed by my attorneys Brendon Friesen and Kenneth Smith of Mansour Gavin LPA.

9. My signature, below, indicates my disapproval of the settlement in its current form and further indicates my consent to the objections filed.

I declare under penalty of perjury that the foregoing is true and correct.

  
DEREK HANSEN

SWORN TO BEFORE ME and subscribed in my presence this 4<sup>th</sup> day of February, 2018.

  
NOTARY PUBLIC



**BRENDON P. FRIESEN**  
Attorney At Law  
NOTARY PUBLIC  
STATE OF OHIO  
My Commission Has  
No Expiration Date  
Section 147.03 O.R.C.

Date	Order #	Wine	Quantity	Unit Price	Order Total
8/8/2016	5562609	Pionero Maccerato Albarino 2014	4	\$11.99	\$47.96
8/1/2016	5546007	Champagne Philippe Prie Brut Tradition	4	\$23.99	\$95.96
7/3/2016	5461401	92 Pt Casa al Vento 'Aria' 2013 Chianti Classico	4	\$12.99	\$51.96
6/23/2016	5440557	Ernest Meurgey-Perron Saint-Veran 2014 White Burgundy	4	\$14.99	\$59.96
6/21/2016	5436851	Chateau Eugenie Cuvee Tsar Pierre le Grand Cahors 2013	4	\$13.99	\$55.96
6/11/2016	5415812	Bordeaux Superieur Chateau de Ribebon Reserve 2011	4	\$14.99	\$59.96
6/2/2016	5392741	Bodegas Gancedo Xestal Mencia 2008	4	\$14.99	\$59.96
3/15/2015	4182062	Champagne Fabienne Prie Brut Reserve NV	4	\$24.99	\$99.96
1/18/2015	4008092	Elite de Saint-Pierre 2012 Chateauneuf-du-Pape	4	\$22.99	\$91.96
9/10/2013	2690843	Cotes de Bordeaux 2009Chateau Lafitte-Marcellin	4	\$10.49	\$41.96
8/7/2013	2614794	Rias Baixas Albarino 2011 Almirante 'Vanidade'	4	\$10.99	\$43.96
7/17/2013	2564979	Spanish Red Wine Mencia 'Vinademoya' LuzDivina Amigo 2011 90 Points Tanzer	4	\$9.99	\$39.96

Total \$749.52



UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF NEW JERSEY

KYLE CANNON, LEWIS LYONS, ) Civil Action No. 16-1452 (RMB)(AMD)  
AND DIANNE LYONS, )  
INDIVIDUALLY AND ON BEHALF )  
OF ALL OTHERS SIMILARLY )  
SITUATED, )  
 )  
Plaintiffs, )  
v. ) **DECLARATION OF VYTAURAS**  
 ) **SASNAUSKAS IN SUPPORT OF**  
ASHBURN CORPORATION, *et al.*, ) **OBJECTION**  
 )  
Defendants.

STATE OF OHIO )  
 ) ss:  
COUNTY OF CUYAHOGA )

Vytauras Sasnauskas, being first duly sworn, declares as follows:

1. I am over the age of twenty one (21), competent to testify and make the following statements based on my personal knowledge.
2. My mailing address is currently 311805 Wellesley Lane, Chardon, Ohio 44024.
3. My phone number is (216) 501-1666.
4. During the period of March 15, 2010 to November 1, 2016, I made 173 purchases of wine through WTSO.com.
5. A true and accurate list of purchases I made through WTSO.com from March 15, 2010 to November 1, 2016 is attached hereto as Exhibit A.



6. Because I made purchases of wine through WTSO.com from March 15, 2010 to November 1, 2016 as a resident of the United States, I am a member of the Class as defined in the Notice of Class Action Settlement.

7. On December 26, 2017, I submitted an online Verification Form to remain in the Class at the web address <https://kccsecure.com/winesettlement/Claimaint>. My Claim ID from the Verification Form submission is AUA-10082031-0.

8. I object to this settlement on the grounds identified in the submitted Objection of Derek Hansen and Vytauras Sasnauskas to Settlement Approval and filed by my attorneys Brendon Friesen and Kenneth Smith of Mansour Gavin LPA.

9. My signature, below, indicates my disapproval of the settlement in its current form and further indicates my consent to the objections filed.

I declare under penalty of perjury that the foregoing is true and correct.

  
VYTAURAS SASNAUSKAS

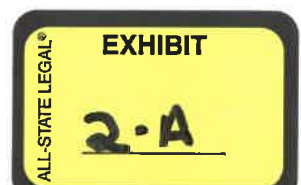
SWORN TO BEFORE ME and subscribed in my presence this 4<sup>th</sup> day of February, 2018.

  
NOTARY PUBLIC



**BRENDON P. FRIESEN**  
Attorney At Law  
NOTARY PUBLIC  
STATE OF OHIO  
My Commission Has  
No Expiration Date  
Section 147.03 O.R.C.

Date	Order #	Wine	Quantity	Unit Price	Order Total
10/31/2016	5766493	Cava El Celleret Brut Nature Reserva NV	4	\$12.99	\$51.96
10/11/2016	5717044	Titiana Pansa Blanca Brut Sparkling 2011	4	\$14.99	\$59.96
9/26/2016	5679115	Baron-Fuente Esprit Champagne Grand Cru Brut NV	3	\$29.99	\$89.97
6/3/2016	5396112	Aimery Sparkling Cremant Rose Limoux NV	4	\$13.99	\$55.96
5/29/2016	5381145	Iron Door Special Selection Alexander Valley Cabernet 2013	4	\$19.99	\$79.96
5/17/2016	5352614	Alante Vineyard Napa Valley Cabernet Sauvignon 2008	3	\$29.99	\$89.97
5/13/2016	5344150	Titiana Pansa Blanca Brut Sparkling 2011	4	\$14.99	\$59.96
5/3/2016	5318568	Rocca di Castagnoli 'Poggio a'Frati' Chianti Classico Riserva 2010	4	\$17.99	\$71.96
5/3/2016	5315755	Auguste Bessac 2013 Chateauneuf-du-Pape	4	\$18.99	\$75.96
5/3/2016	5312803	Bodegas y Vinedos del Jalon Castillo de Maluenda Punto y Seguido 2009	4	\$10.99	\$43.96
5/3/2016	5306468	La Esquina Torrontes 2014	4	\$8.99	\$35.96
4/30/2016	5299937	LC Villa Prosecco 2015	6	\$9.99	\$59.94
4/27/2016	5294174	Vite Colte Barolo 2012	4	\$18.99	\$75.96
4/11/2016	5251212	Réserve de L'Abbé Côtes du Rhône Rosé 2015	4	\$10.99	\$43.96
4/10/2016	5247961	Terredavino Barolo 2011	4	\$17.99	\$71.96
2/10/2016	5074759	Castellani Casalforno Chianti Classico Riserva 2010	4	\$12.99	\$51.96
2/3/2016	5060330	Cowhorn Sentience Oregon Syrah 2011	4	\$19.99	\$79.96
1/30/2016	5047636	93 Pt. Pietro Rinaldi Barolo 2010	3	\$26.99	\$80.97
1/12/2016	4992336	Bodegas del Rosario 'Lorca' Monastrell Bullas DO 2009	4	\$9.99	\$39.96
1/12/2016	4985007	Arturo Garcia 'Solar de Sael' Reserva 2005	4	\$14.99	\$59.96
1/2/2016	4960632	Bodegas y Vinedos 'Tardencuba' 2009 Roble Toro DO	4	\$9.99	\$39.96
12/22/2015	4931573	Castelli del Grevepesa 'Castelgreve' 2009 Chianti Classico DOCG Riserva	4	\$14.99	\$59.96
12/13/2015	4907030	93 Pt. Sobrero Ciabot Tanasio Barolo 2010	4	\$24.99	\$99.96
11/10/2015	4809047	92 Pt. Barolo 2010 Luca Bosio	4	\$22.99	\$91.96
10/7/2015	4720611	Terredavino Barolo DOCG 2010	4	\$17.99	\$71.96
9/2/2015	4618698	92 Pt. Rioja 2011 Consejo de la Alta Cata de Consejero	4	\$14.99	\$59.96
8/22/2015	4591766	Cotes du Rhone Domaine de Dionysos 'La Devezé' 2012	4	\$13.99	\$55.96
7/14/2015	4504184	Cotes du Roussillon Villages 2008 Thunevin-Calvet 'Les Dentelles' Cuvee Red Blend	4	\$18.99	\$75.96
7/14/2015	4495423	Gruet Winery 'Limited Release' Brut Grand 2012 Blanc de Noir	4	\$17.99	\$71.96
5/21/2015	4359377	Champagne Baron Albert Brut Tradition NV	4	\$19.99	\$79.96
4/28/2015	4291680	Travaglini Gattinara Riserva 2008 Magnum (1.50 Liter)	1	\$64.99	\$0.00
4/25/2015	4281419	Tinazzi Montere Ripasso Valpolicella Classico Superiore DOC 2011	4	\$13.99	\$55.96
4/12/2015	4251840	Coral Duero Rompededas 2006	4	\$14.99	\$59.96





Date	Order #	Wine	Quantity	Unit Price	Order Total
4/11/2015	4248238	Barolo Livia Fontana 2006 Terredavino 2010 DOCG 2-Pack	1	\$44.99	\$44.99
3/28/2015	4215299	Chateau de Cazanove Champagne Bichat Brut Rose Epernay NV	4	\$24.99	\$99.96
3/19/2015	4191197	Domaine Chene Bourgogne Reserve Pinot Noir 2013	4	\$13.99	\$55.96
3/3/2015	4154870	Castelluccio La Mia Riserva 2006	4	\$14.99	\$59.96
3/3/2015	4153728	Domaine Fond Croze 'Les Roches' 2012 Cotes du Rhone Villages 100% Syrah	4	\$15.99	\$63.96
3/3/2015	4149548	Domaine de la Presidente Chateauneuf-du-Pape'Le Nonce' 2012	4	\$17.99	\$71.96
2/11/2015	4087607	Pico Cuadro Original Ribera del Duero 2010	4	\$16.99	\$67.96
2/6/2015	4075163	Virgen del Aguila Artigazo 2007	4	\$14.99	\$59.96
2/3/2015	4068011	Coral Duero Rompesedas 2006	4	\$14.99	\$59.96
1/28/2015	4051054	Casado Morales Rioja 2004 Gran Reserva	4	\$22.99	\$91.96
1/26/2015	4047534	Champagne Emile Leclere a Mardeuil Blanc de Blancs Brut NV	4	\$23.99	\$95.96
1/20/2015	4018644	Northern Rhone Cru St. Joseph 'Caroline' 'Cuvee Prestige' 2009 by Louis Cheze	1	\$23.99	\$23.99
1/20/2015	4017602	Terres de Vidalba 'TOCS' 2006	1	\$19.99	\$19.99
1/20/2015	4013547	Olarra Rioja Reserva Cerro Anon 2006	2	\$11.99	\$23.98
1/20/2015	4012648	Champagne Forget-Brimont Brut 1er Cru NV	1	\$29.99	\$29.99
1/18/2015	4008073	Elite de Saint-Pierre 2012 Chateauneuf-du-Pape	4	\$22.99	\$91.96
1/17/2015	4006246	Rioja Reserva Red Blend Bodegas Ondarre 2008 Grupo Bodegas Olarra	4	\$11.49	\$45.96
1/4/2015	3973754	Munselle Vineyards Coyote Crest 2008 Alexander Valley Cabernet Sauvignon	4	\$19.99	\$79.96
1/3/2015	3972824	Amarone Classico Valentina Cubi 'Morar' 2005	3	\$29.99	\$89.97
12/31/2014	3966736	Terre da Vino La Casa in Collina Barbaresco DOCG 2009	4	\$14.99	\$59.96
12/21/2014	3947201	Bordeaux Left Bank Graves 2010 Chateau de Portets	4	\$16.99	\$67.96
12/20/2014	3945516	Ribera del Duero Bodegas Recoletas Reserva 2005	4	\$15.99	\$63.96
12/18/2014	3939745	Shadowood Napa Valley Red Wine Reserve 2012	4	\$12.99	\$51.96
11/18/2014	3855354	Havens 2012 Bourriquot Oakville Napa Valley Red by Aaron Pott	4	\$17.99	\$71.96
10/27/2014	3797877	Champagne Henri Abele Rose NV	3	\$27.99	\$83.97
10/14/2014	3766398	Rioja Reserva 2006 Bodega San Prudencio Cueto	4	\$12.99	\$51.96
10/14/2014	3754023	Ghione Ca' de Lion Monte Luna Nebbiolo 2011	4	\$16.99	\$67.96
10/14/2014	3752427	Andre Delorme Cremant de Bourgogne Brut NV	4	\$14.99	\$59.96
10/14/2014	3752193	Pope Valley Merlot Eakle Ranch Napa Valley 2005	4	\$12.99	\$51.96
10/4/2014	3730896	Super Tuscan 2010 I Giusti and Zanza Vigneti 'Nemorino' Toscana IGT	4	\$14.99	\$59.96
9/23/2014	3704532	Schug Winery Winemaker's Reserve Chardonnay Sonoma Coast 2012	4	\$16.99	\$67.96
9/21/2014	3700395	Goldschmidt Royce 2012 Dry Creek Red Wine	4	\$13.99	\$55.96
9/21/2014	3700051	Mahoney Carneros Estate Pinot Noir 2011	4	\$13.99	\$55.96

## SASNAUSKAS ORDER HISTORY

Date	Order #	Wine	Quantity	Unit Price	Order Total
9/21/2014	3698878	Rocca Fizzano Chianti Classico Riserva 2009	6	\$16.99	\$101.94
9/20/2014	3697587	Bodega Vinessens Sein Alicante 2011	4	\$13.99	\$55.96
8/21/2014	3621143	Querceto di Castellina Podalirio Super Tuscan 2009/2010 4-Pack	1	\$79.99	\$79.99
8/21/2014	3619328	Haut Pick Sauternes 2010 By Ch. Bastor-Lamontagne	4	\$18.99	\$75.96
8/11/2014	3599284	Bordeaux Right Bank Fronsac 2011 Chateau Tour du Moulin	4	\$14.99	\$59.96
8/7/2014	3588066	Kingsford Manor Napa Valley Sauvignon Blanc Reserve 2013	4	\$12.99	\$51.96
7/29/2014	3567404	Chateau Haut Nouchet Pessac-Leognan 2010	4	\$16.99	\$67.96
7/29/2014	3566473	Sparkling Chardonnay Cremant de Bourgogne Blanc de Blancs NV Henri de Villamont	4	\$14.99	\$0.00
7/29/2014	3562914	92 Pt Rioja Reserva 2009 Bodegas Tobia 'Oscar Tobia'	4	\$16.99	\$67.96
7/24/2014	3540956	93 Pt Rioja 2005 Bodegas Escudero Vidau	3	\$24.99	\$74.97
6/13/2014	3444150	Ribera del Duero Bodegas Recoletas Reserva 2005	4	\$15.99	\$63.96
6/8/2014	3429005	93 Pt. Super Tuscan I Balzini Red Label 2009	4	\$17.99	\$71.96
6/7/2014	3428635	Loxarel '790' Cabernet Sauvignon Reserva 2008	4	\$12.99	\$51.96
6/4/2014	3417601	Domaine Masson Blondelet Sancerre Thauvenay 2013	4	\$15.99	\$63.96
6/2/2014	3413434	Ondarre Ursa Maior Rioja Reserva 2006	4	\$12.99	\$51.96
5/22/2014	3388690	90pt Bordeaux Superieur 2012 Chateau Saint Michel	4	\$11.99	\$47.96
5/21/2014	3386124	100% Sauvignon Blanc 2013 Loire Valley by Domaine Xavier Frissant	4	\$12.99	\$51.96
5/13/2014	3365366	Sparkling Chardonnay Cremant de Bourgogne Blanc de Blancs NV Henri de Villamont	4	\$14.99	\$59.96
5/13/2014	3363621	Domaine du Grand Montmirail 'Vacqueyras' Rhone Blend 2011	4	\$16.99	\$67.96
5/13/2014	3362579	92 Pt. Baloiro Reserva 2009 Bodega Luzdivina Amigo	4	\$13.99	\$55.96
5/13/2014	3358755	Chablis Premier Cru 'Cote de Lechet' 2010 Simonnet-Febvre	4	\$17.99	\$71.96
5/13/2014	3357200	Napa Private Reserve Cabernet Franc 2008 Saviez Vineyards	4	\$15.99	\$63.96
5/13/2014	3356568	Cava Brut Reserva Poema NV Spanish Sparkling	4	\$11.99	\$47.96
5/4/2014	3329112	Panther Creek Willamette Valley Winemaker's Cuvee Pinot Noir 2010	4	\$12.99	\$51.96
5/3/2014	3328820	Champagne Charles Mignon Cuvee Comte De Marne Brut Grand Cru NV	2	\$39.99	\$79.98
4/28/2014	3314500	Schug Winemaker's Reserve Pinot Noir Carneros 2012	4	\$19.99	\$79.96
4/27/2014	3311923	Robert Storey-Burgess Cellars Cabernet Napa Valley 2011	4	\$18.99	\$75.96
4/26/2014	3309060	Sempre Vive Cabernet Old Vine 2005 & 2006 4-Pack	1	\$79.96	\$79.96
4/24/2014	3302247	Dignitas Willamette 2012 Reserve Pinot Noir	4	\$16.99	\$67.96
4/23/2014	3299116	Olarra Rioja Reserva Cerro Anon 2006	4	\$11.89	\$47.56
4/19/2014	3283433	Barbaresco 2006 Giribaldi Winery 93 Points WS!	4	\$19.99	\$79.96
4/12/2014	3268807	Andre Delorme Hautes-Cote de Nuits Pinot Noir 2011	4	\$14.99	\$59.96



Date	Order #	Wine	Quantity	Unit Price	Order Total
4/6/2014	3251214	Northern Rhone 2-Pack La Louvee Cornas 06/07 Jean-Luc Colombo	1	\$68.99	\$68.99
4/5/2014	3247488	Champagne Veuve Doussot 2008 Brut Cuvee 'Ernestine'	2	\$37.99	\$75.98
3/29/2014	3228731	Ribera del Duero Reserva Bodegas Recoletas 2005	4	\$15.99	\$63.96
3/28/2014	3228312	92 pt Bodegas Resalte de Penafiel Pena Roble Reserva 2004	4	\$19.99	\$79.96
3/25/2014	3220111	Chianti Classico Riserva Vignavecchia 2009	4	\$17.79	\$71.16
3/22/2014	3211207	95 Pt. Tabarrini Montefalco Colle Grimaldesco Montefalco Sagrantino DOCG 2008	3	\$24.99	\$74.97
3/21/2014	3208210	Bodegas Olarra Anares Rioja Reserva 2006	4	\$12.99	\$51.96
3/12/2014	3187054	Bodegas El Angosto Los Almendros Red Wine 2009	4	\$16.99	\$67.96
3/12/2014	3185637	Cavalier Bartolomeo Barolo Solanotto Altenasso 2009	3	\$26.99	\$80.97
3/11/2014	3182965	Valentina Cubi (Veneto) Amarone Classico 'Morar' 04/05/06 Vertical 3-Pack	1	\$89.99	\$89.99
3/7/2014	3172612	Panther Creek Willamette Valley Winemaker's Cuvee Pinot Noir 2010	4	\$12.99	\$51.96
3/6/2014	3169141	Olarra Rioja Reserva Cerro Anon 2006	4	\$11.89	\$47.56
3/5/2014	3166389	Piedmont Barbera 2012 Fontanafredda 'Varej'	8	\$9.99	\$79.92
3/3/2014	3159655	Bodega Matarredonda Libranza 2006	4	\$16.99	\$67.96
3/1/2014	3156545	Andre Delorme Cremant de Bourgogne Brut NV	4	\$14.99	\$59.96
2/26/2014	3149108	Maroon Wines Signature Reserve Napa Valley 2010 Cabernet Sauvignon	4	\$19.99	\$79.96
2/16/2014	3122377	Castello di ColleMassari Lombrone Montecucco Riserva 2009	3	\$27.99	\$83.97
2/8/2014	3101238	93 Pt Langhe Nebbiolo 2012 Cascina in Langa Amalia	4	\$16.99	\$67.96
2/8/2014	3099738	Hautes-Cote du Beaune White Burgundy 2010 Roland Thevenin	4	\$13.99	\$55.96
1/29/2014	3075510	Eagles Trace Napa Valley Merlot 2006/2007 4-Pack	1	\$89.99	\$89.99
1/28/2014	3074599	2009 Grand Cru Saint-Emilion Chateau Tour de Lagarde	4	\$18.99	\$75.96
1/28/2014	3073206	Chianti Classico Riserva Spalletti 2009 By Giovanni Folonari	4	\$14.99	\$59.96
1/28/2014	3072277	Gigondas 2005 Oriel Wines 'Jocunda' By Louis Barruol	4	\$14.99	\$59.96
1/28/2014	3070240	Rosso di Montalcino Piancornello 2010	4	\$16.99	\$67.96
1/28/2014	3066653	Rioja Reserva Mayor de Ondarre Bodegas Ondarre 2006	4	\$18.99	\$75.96
1/28/2014	3059890	La Mer Pinot Noir 2010 Santa Maria Valley	4	\$14.99	\$59.96
1/28/2014	3054248	Premieres Cotes de Blaye Bordeaux Rouge 2008 Ch. Crusquet de Lagarcie	4	\$13.99	\$55.96
1/28/2014	3052917	Cremant d'Alsace NV Pfaffenheim 'Excellence' Brut Cuvee Prestige	4	\$14.99	\$59.96
1/28/2014	3052396	Bordeaux Left Bank 2009 Medoc Cru Bourgeois Chateau Maison Blanche	4	\$14.99	\$59.96

Date	Order #	Wine	Quantity	Unit Price	Order Total
1/11/2014	3007681	93 Pt. Super Tuscan I Balzini Red Label 2009	4	\$17.99	\$71.96
1/10/2014	3005032	Monte del Fra Amarone Classico 2008 Tenuta Lena di Mezzo	3	\$24.99	\$74.97
1/4/2014	2991886	Ribera del Duero Reserva Bodegas Recoletas 2005	4	\$15.99	\$63.96
12/30/2013	2982211	Chateauneuf-du-Pape Tradition 2010 La Celestiere	4	\$23.99	\$95.96
12/17/2013	2952382	Domaine de Dionysos 'La Cigarette' Cairanne Cotes du Rhone 2005	4	\$14.99	\$59.96
12/14/2013	2944627	Champagne Tendil & Lombardi Blanc de Noir NV	3	\$24.99	\$74.97
12/12/2013	2939279	Champagne Philippe Prie Brut Tradition N/V Magnum (1.50L)	2	\$49.99	\$99.98
12/12/2013	2934723	Brunello Magnum (1.50L) Vertical 3-Pack Scopone 06/07/08	1	\$199.99	\$199.99
11/22/2013	2884280	Domaine du Mont M. Bressand Vire-Clesse Blanc 2012	4	\$14.99	\$59.96
11/17/2013	2870748	Sancerre 2012 100% Sauvignon Blanc Cherrier Pere & Fils Les 7 Hommes	3	\$17.99	\$53.97
11/17/2013	2870740	Sancerre 2012 100% Sauvignon Blanc Cherrier Pere & Fils Les 7 Hommes	1	\$17.99	\$17.99
11/15/2013	2867305	Vire-Clesse Blanc 2011 Roland Thevenin	4	\$12.99	\$51.96
11/12/2013	2859399	Brut Champagne N/V Philippe Fourrier Carte D'Or	4	\$24.99	\$99.96
11/12/2013	2858199	Havens Winery Bourriquot Napa Valley 2010	4	\$19.99	\$79.96
11/3/2013	2836547	Rioja Crianza 2008 #59 top 100 WS Dinastia Vivanco	4	\$13.99	\$55.96
10/20/2013	2802105	Chateauneuf-Du-Pape Tiare Imperiale 2010	4	\$22.99	\$91.96
10/17/2013	2794546	Cotes du Rhone Villages Cairanne Dom. de Dionysos La Cigarette 2011 By Philippe Cambie	4	\$12.99	\$51.96
9/24/2013	2739067	Amarone della Valpolicella DOC Classico Bellini 2009	4	\$23.99	\$95.96
9/10/2013	2707465	Sardinia White Wine Argiolas 'Iselis' Bianco Isola dei Nuraghi IGT 2012	4	\$12.99	\$51.96
9/10/2013	2707306	Northern Rhone Syrah Saint-Joseph AOC 2010 Les Larmes du Pere Maison Alain Paret	4	\$18.99	\$75.96
9/10/2013	2706526	Super Tuscan 2007 AnimaLibera 'Alma 3' Toscana IGT By Emiliano Falsini	4	\$11.99	\$47.96
9/10/2013	2704654	Macon-Chardonnay 'Les Crets' 2009 Chateau De Messey	4	\$14.99	\$59.96
9/10/2013	2700488	Bourgogne Pinot Noir Philippe Leclerc 2009	4	\$16.99	\$67.96
9/10/2013	2697563	Chianti DOCG 2011 'Colle De' Fossili' Fattoria Piccaratico	4	\$9.99	\$39.96
9/10/2013	2693087	Chianti Classico Riserva Castello di Bibbione 2008	4	\$17.99	\$71.96
9/10/2013	2691065	Super Tuscan 2005 Vitanza 'Quadrimento' Toscana IGT	4	\$14.99	\$59.96
9/10/2013	2689445	Barbaresco DOCG 2007 Fontanafredda 'Varej'	4	\$18.99	\$75.96
9/10/2013	2689330	Gigondas AOC 2009 Cotes du Rhone Cru Domaine du Pradas	4	\$17.99	\$71.96
9/10/2013	2688968	Red Burgundy 2009 Chassagne-Montrachet Chateau Chassagne de Montrachet	4	\$18.99	\$75.96

Date	Order #	Wine	Quantity	Unit Price	Order Total
9/4/2013	2677540	Willamette Vly Pinot Noir Freedom Hill Vineyard 2009 Panther Creek	4	\$19.99	\$79.96
9/2/2013	2673856	Super Tuscan 4-Pack I Balzini White Label 2008 I Giusti & Zanza Nemorino Toscana IGT 2010	1	\$69.99	\$69.99
8/26/2013	2661126	Prosecco Superiore NV Serre ColSENTA Valdobbiadene DOCG	4	\$12.99	\$51.96
8/17/2013	2639498	Cava Brut Reserva N/V Poema Spanish Sparkling	4	\$12.99	\$51.96
8/11/2013	2622387	Sauvignon Blanc Reserve Maxwell Creek Winery Napa Valley 2012	4	\$12.99	\$51.96
8/9/2013	2619273	Sauternes 2010 Bastor Lamontagne Chateau Bordenave	4	\$16.99	\$67.96
8/9/2013	2618992	Burgundy Pinot Noir Laleure-Piot Beaune 2010	4	\$17.99	\$71.96
8/1/2013	2599626	94 Pt. Estate Cabernet Arger-Martucci Vineyards Atlas Peak Napa 2007	4	\$24.99	\$99.96
8/1/2013	2599192	Cotes de Provence Rose Vieilles Vignes 2012 Dom. du Garde Temps	4	\$10.99	\$43.96
7/5/2013	2543190	Brut Reserve Champagne Charles de Monrency NV By Nicolas Gueusquin	4	\$19.99	\$79.96
7/4/2013	2542006	Brunello DOCG 3-pack Terrasole 2007 Lecciaia Manapetra 2006 La Fiorita 2005	2	\$74.99	\$149.98
7/2/2013	2538664	Cremant de Bourgogne N/V Blanc de Blancs Brut Jaffelin Grand Cuvee Speciale	4	\$13.99	\$55.96
6/19/2013	2491368	Chianti Classico DOCG Rocca di Castagnoli Tuscany 2009	4	\$13.49	\$53.96
6/19/2013	2490846	Red Burgundy 2008 Chorey-Les-Beaune Domaine Laleure-Piot	4	\$14.99	\$59.96
6/19/2013	2488423	Barbera D'Alba 2004 Tenuta Rocca 'Roca Neira'	4	\$9.99	\$39.96
6/19/2013	2488052	Bordeaux Superieur 2008 Reserve du Croix Mouton By Michel Rolland	4	\$9.99	\$39.96
6/19/2013	2488023	Chianti Rufina Riserva Lavacchio Cedro 2004	4	\$11.99	\$47.96

Total \$11,390.03

UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF NEW JERSEY

KYLE CANNON, LEWIS LYONS, AND	)	Civil Action No. 16-1452 (RMB)(AMD)
DIANNE LYONS, INDIVIDUALLY	)	
AND ON BEHALF OF ALL OTHERS	)	
SIMILARLY SITUATED,	)	
	)	
Plaintiffs,	)	
v.	)	
ASHBURN CORPORATION, <i>et al.</i> ,	)	<b><u>DECLARATION OF RYAN RUSSELL IN</u></b>
	)	<b><u>SUPPORT OF OBJECTION</u></b>
Defendants.	)	

COUNTY OF CUYAHOGA  
STATE OF OHIO

Ryan Russell, being first duly sworn, declares as follows:

1. I am over the age of twenty one (21), competent to testify and make the following statements based on my personal knowledge.
2. My mailing address is currently 593 Lander Drive, Highland Heights, Ohio 44143.
3. My phone number is (216) 573-0357.
4. During the period of March 15, 2010 to November 1, 2016, I made ten separate purchases of wine through WTSO.com.
5. A true and accurate list of purchases I made through WTSO.com from March 15, 2010 to November 1, 2016 is attached hereto as Exhibit A.
6. Because I made purchases of wine through WTSO.com from March 15, 2010 to November 1, 2016 as a resident of the United States, I am a member of the Class as defined in the Notice of Class Action Settlement.



7. On December 22, 2017, I submitted an online Verification Form to remain in the Class at the web address <https://kccsecure.com/winesettlement/Claimaint>. My Claim ID from the Verification Form submission is AUA-10221989-3.

8. I object to this settlement on the grounds identified in the submitted Objection of Derek Hansen, Vytautas Sasnauskas, and Ryan Russell to Settlement Approval and filed by my attorneys Brendon Friesen and Kenneth Smith of Mansour Gavin LPA.

9. My signature, below, indicates my disapproval of the settlement in its current form and further indicates my consent to the objections filed.

I declare under penalty of perjury that the foregoing is true and correct.

  
\_\_\_\_\_  
RYAN RUSSELL

SWORN TO BEFORE ME and subscribed in my presence this 6 day of February, 2018.

  
\_\_\_\_\_  
NOTARY PUBLIC



SAMANTHA WHITE  
NOTARY PUBLIC  
IN AND FOR THE STATE OF OHIO  
MY COMMISSION EXPIRES  
OCTOBER 8, 2018



Date	Order #	Wine	Quantity	Unit Price	Order Total
10/23/2016	5747198	Entre-Deux-Mers 2015 Bordeaux Blanc Chateau Valade	4	\$11.99	\$47.96
10/6/2016	5702572	Gran Viu Seleccion 2012 Vinedos y Bodegas Pablo	4	\$14.99	\$59.96
9/9/2016	5629387	Domaine du Touch 2015 Cotes de Gascogne Blanc	4	\$10.99	\$43.96
7/24/2016	5528943	Entre-Deux-Mers 2015 White Bordeaux Chateau La Grande Metairie	4	\$12.99	\$51.96
7/23/2016	5526326	93 Pt. Ribera del Duero 2009 Garcia de Aranda Senorio de Los Baldios	4	\$14.99	\$59.96
7/19/2016	5505320	Le Blason du Prince Chateauneuf-du-Pape 2014	1	\$19.99	\$19.99
7/19/2016	5497434	Livia Fontana Barolo DOCG 2006	1	\$19.99	\$19.99
7/17/2016	5491950	Bordeaux Superieur 2011 Chateau de Macard Reserve	4	\$13.99	\$55.96
7/7/2016	5471434	Conti Zecca Negroamaro Salento IGT 2012	4	\$12.99	\$51.96
6/28/2016	5451697	La Legua Crianza 2010 Tempranillo	4	\$12.99	\$51.96

Total \$463.66

